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AZ CORP COMMISSION  
DOCKET CONTROL

ORIGINAL


August 13, 2015

*Via UPS Overnight Delivery*

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

RE: In the Matter of the Application of Dieca Communications dba Covad  
Communications Company, et al.  
Docket Nos. T-03632A-06-0091  
T-03406A-06-0091  
T-03267A-06-0091  
T-03432A-06-0091  
T-04302A-06-0091  
T-01051B-06-0091

Arizona Corporation Commission  
DOCKETED  
AUG 14 2015

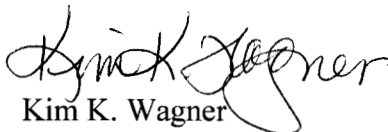
DOCKETED BY 

Dear Docket Control:

Enclosed are the original and 13 copies of the Comments of Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and Electric Lightwave, LLC, all doing business as Integra Telecom, in connection with the above-referenced docket.

Please feel free to contact me should you have any questions.

Sincerely,



Kim K. Wagner  
Legal & Regulatory Administrator  
Integra Telecom  
763-745-8468 (direct)  
763-745-8459 (department fax)  
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Enclosures

cc: Parties of Record

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

RECEIVED

2 SUSAN BITTER SMITH  
Chairman

3 BOB STUMP  
Commissioner

4 BOB BURN  
Commissioner

5 DOUG LITTLE  
Commissioner

6 TOM FORESE  
Commissioner

2015 AUG 14 P 1:06

AZ CORP COMMISS  
DOCKET CONTROL

8 IN THE MATTER OF THE APPLICATION  
9 OF DIECA COMMUNICATIONS DBA  
10 COVAD COMMUNICATIONS COMPANY,  
11 ESCHELON TELECOM OF ARIZONA, INC.,  
12 MCLEODUSA TELECOMMUNICATIONS  
13 SERVICES, INC., MOUNTAIN  
14 TELECOMMUNICATIONS, INC., XO  
15 COMMUNICATIONS SERVICES, INC. AND  
16 QWEST CORPORATION REQUEST FOR  
COMMISSION PROCESS TO ADDRESS  
KEY UNE ISSUES ARISING FROM  
TRIENNIAL REVIEW REMAND ORDER,  
INCLUDING APPROVAL OF QWEST WIRE  
CENTER LISTS

Docket Nos. T-03632A-06-0091  
T-03406A-06-0091  
T-03267A-06-0091  
T-03432A-06-0091  
T-04302A-06-0091  
T-01051B-06-0091

COMMENTS OF ESCHELON  
TELECOM OF ARIZONA, INC.,  
MOUNTAIN  
TELECOMMUNICATIONS, INC.,  
AND ELECTRIC LIGHTWAVE,  
LLC, ALL DOING BUSINESS AS  
INTEGRA TELECOM

17 Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and  
18 Electric Lightwave, LLC, all doing business as Integra Telecom (collectively referred to  
19 as "Integra") respectfully provide this update to its July 24, 2015 comments to Qwest  
20 Corporation dba: CenturyLink QC's ("CenturyLink"), June 24, 2015 Application for  
21 Approval of 2015 Additions to the Non-Impaired Wire Center List.  
22

23 **Background**

24 On July 24, 2015 Integra filed comments with the Commission objecting to  
25 CenturyLink's Application for Approval of 2015 Additions to the Non-Impaired Wire  
26 Center List requesting the Phoenix Cactus (PHNXAZCA) wire center classification  
27  
28

1 change from Tier 2 to Tier 1, based on the number of fiber-based collocations in the wire  
2 center. At the time of filing its comments, Integra had been unable to verify all the fiber-  
3 based collocators identified by CenturyLink. Based on the incomplete status of Integra's  
4 review, Integra objected to CenturyLink's request to reclassify the Phoenix Cactus  
5 (PHNXAZCA) as a Tier 1 wire center. Integra requested two additional weeks to  
6 complete the verification of CenturyLink's data and indicated Integra would update the  
7 Commission as soon as its verification was complete, and if appropriate, remove its  
8 objection to CenturyLink's request.  
9

#### 10 11 **Discussion**

12 Integra contacted Commission staff on August 10, 2015 to communicate that it  
13 had not yet completed its verification process with the last remaining carrier. With  
14 assistance from Commission staff and CenturyLink, Integra received a verification  
15 response from the carrier on 8/12/2015. Based on the response of the remaining carrier,  
16 Integra withdraws its previous objection to changing the Phoenix Cactus (PHNXAZCA)  
17 wire center classification from Tier 2 to Tier 1.  
18

#### 19 **Conclusion**

20  
21 Due to the permanency and impact of changes in wire center classifications,  
22 Integra appreciates the additional time and assistance offered by the Commission and  
23 CenturyLink needed to complete its verification of the data supporting CenturyLink's  
24 petition. Based on the result of its verifications, Integra does not oppose reclassifying  
25 Phoenix Cactus (PHNXAZCA) wire center from a Tier 2 wire center to a Tier 1 wire  
26 center.  
27  
28

1 RESPECTFULLY submitted this 13th day of August, 2015.

2  
3 

4  
5 \_\_\_\_\_  
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13  
14 **Original and 13 copies filed**  
15 **via UPS overnight delivery**  
16 **this 13th day of August, 2015, with:**

17 Docket Control Center  
18 Arizona Corporation Commission  
19 1200 West Washington Street  
20 Phoenix, Arizona 85007

21  
22 **Copies of the foregoing delivered**  
23 **via UPS overnight delivery this**  
24 **13th day of August, 2015 to:**

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12 **Copies of the foregoing sent via**  
13 **U.S. Mail this 13th day of August, 2015, to:**

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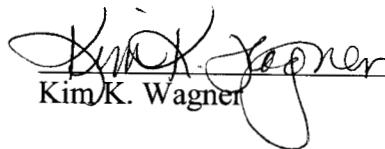
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